



LOUIS J. PERRET
Clerk of Court, Lafayette Parish
P. O. BOX 2009
LAFAYETTE, LA 70502
Telephone: (337) 291-6400

FEBRUARY 2, 2016

WILLIAM W GOODELL
PO BOX 52663
LAFYETTE, LA 70505-2663

RE: SALVATION ARMY, ET AL
VS
UNION PACIFIC RAILROAD CO, ET AL
DOCKET NUMBER: C-20160548 F


Dear Sir or Madam:

In accordance with L.A.R.S. 13:4688, when a suit has been filed in State District Court for damages arising from an offense or quasi-offense, you are required to complete attached reporting form from the Supreme Court of Louisiana.

Please return the attached reporting form immediately to the Lafayette Parish Clerk of Court Office for further processing.

Should you have any questions concerning this matter, please do not hesitate to contact us.

Sincerely,



Deputy Clerk of Court
Lafayette Parish



D41276296

cc_jmdaugereau

Ordered by Atty.: WILLIAM W. GOODELL, JR.

CITATION

SALVATION ARMY, ET AL

FIFTEENTH JUDICIAL DISTRICT COURT

VS

DOCKET NUMBER: C-20160548 F

UNION PACIFIC RAILROAD CO, ET AL

PARISH OF LAFAYETTE, LOUISIANA

STATE OF LOUISIANA

TO: UNION PACIFIC RAILROAD COMPANY
THROUGH ITS REGISTERED AGENT:
C T CORPORATION SYSTEM
3867 PLAZA TOWER DRIVE
BATON ROUGE, LA 70816

of the Parish of E. Baton Rouge

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). You should file an answer or other pleading to said petition in the office of the Clerk of the FIFTEENTH JUDICIAL DISTRICT COURT, in the Lafayette Parish Courthouse, LAFAYETTE, Louisiana, within fifteen (15) days after the service hereof. Alternatively, your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

Witness the Honorable Judges of said Court, this FEBRUARY 2, 2016.

Deputy Clerk of Court
Lafayette Parish

*Attached are the following documents:
PETITION FOR DAMAGES, EXHIBITS A-G

SHERIFF'S RETURN
LAFAYETTE PARISH SHERIFF

DATE SERVED: _____, 20____ TIME: _____

SERVED: _____

PERSONAL () _____

DOMICILIARY () ON _____

UNABLE TO LOCATE _____ MOVED () _____ NO SUCH ADDRESS () _____

OTHER REASON: _____

RECEIVED TOO LATE FOR SERVICE () _____

SERVICE OF WITHIN PAPERS _____

COSTS FEE \$ _____ MILEAGE \$ _____ TOTAL \$ _____

DEPUTY _____

D41276270
cc_jmdaugereau

Ordered by Atty.: WILLIAM W. GOODELL, JR.

CITATION

SALVATION ARMY, ET AL

FIFTEENTH JUDICIAL DISTRICT COURT

VS

DOCKET NUMBER: C-20160548 F

UNION PACIFIC RAILROAD CO, ET AL

PARISH OF LAFAYETTE, LOUISIANA

STATE OF LOUISIANA

TO: CONSOLIDATED COMPANIES, INC.
THROUGH ITS REGISTERED AGENT:
WINSLOW J. CHADWICK, JR.
1 GALLERIA BLVD., SUITE 1512
METAIRIE, LA 70001

of the Parish of Jefferson

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). You should file an answer or other pleading to said petition in the office of the Clerk of the FIFTEENTH JUDICIAL DISTRICT COURT, in the Lafayette Parish Courthouse, LAFAYETTE, Louisiana, within fifteen (15) days after the service hereof. Alternatively, your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

Witness the Honorable Judges of said Court, this FEBRUARY 2, 2016.


Deputy Clerk of Court
Lafayette Parish

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PETITION FOR DAMAGES, EXHIBITS A-G

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LAFAYETTE PARISH SHERIFF

DATE SERVED: _____, 20____ TIME: _____
SERVED: _____
PERSONAL () _____
DOMICILIARY () ON _____
UNABLE TO LOCATE _____ MOVED () _____ NO SUCH ADDRESS () _____
OTHER REASON: _____
RECEIVED TOO LATE FOR SERVICE () _____
SERVICE OF WITHIN PAPERS _____
COSTS FEE \$ _____ MILEAGE \$ _____ TOTAL \$ _____
DEPUTY _____



D41276288

cc_jmdaugereau

Ordered by Atty.: WILLIAM W. GOODELL, JR.

CITATION

SALVATION ARMY, ET AL

FIFTEENTH JUDICIAL DISTRICT COURT

VS

DOCKET NUMBER: C-20160548 F

UNION PACIFIC RAILROAD CO, ET AL

PARISH OF LAFAYETTE, LOUISIANA

STATE OF LOUISIANA

TO: SOUTHERN PACIFIC MOTOR TRUCKING COMPANY
THROUGH ITS REGISTERED AGENT:
C T CORPORATION SYSTEM
3867 PLAZA TOWER DRIVE
BATON ROUGE, LA 70816

of the Parish of E. Baton Rouge

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Witness the Honorable Judges of said Court, this FEBRUARY 2, 2016.

Deputy Clerk of Court
Lafayette Parish

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PETITION FOR DAMAGES, EXHIBITS A-G

SHERIFF'S RETURN LAFAYETTE PARISH SHERIFF

DATE SERVED: _____, 20____ TIME: _____

SERVED: _____

PERSONAL () _____

DOMICILIARY () ON _____

UNABLE TO LOCATE _____ MOVED () _____ NO SUCH ADDRESS () _____

OTHER REASON: _____

RECEIVED TOO LATE FOR SERVICE () _____

SERVICE OF WITHIN PAPERS _____

COSTS FEE \$ _____ MILEAGE \$ _____ TOTAL \$ _____

DEPUTY _____

From Elizabeth A. Roche 1.504.881.1765 Wed Feb 17 15:10:37 2016 MST Page 2 of 8



365 Canal Street
Suite 1170
New Orleans, LA 70130

FACSIMILE COVER SHEET

Date: February 17, 2016

TO: Lafayette Parish Clerk of Court Honorable Louis J. Perret	FROM: Elizabeth Roché
FAX NUMBER: (337) 291-6480	SENDER FAX NUMBER: (504) 881-1765
PHONE NUMBER: (337) 291-6400	SENDER PHONE NUMBER: (504) 799-2845
CC: Honorable David M. Smith Elena Arcos Pecoraro Steven J. Levine Cliff LaCour	TOTAL NUMBER OF PAGES: 7, including cover
RE: <i>Salvation Army, et al., v. Union Pacific Railroad Company, et al.</i> No. 2016-0548-F, 15 th Judicial District Court	
MESSAGE: Attached is Plaintiffs' <i>Ex Parte Motion to Preserve Evidence and For Motion</i> in the above-referenced matter.	

This facsimile is intended for the addressee(s) only and may contain privileged or confidential information. The information is intended only for the use of the individual(s) or entity(ies) named above. If you are not the intended recipient(s), you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone to arrange for the return of the document(s).

From Elizabeth A. Roche 1.504.881.1765 Wed Feb 17 15:10:37 2016 VST Page 1 of 8

Fax recipient information

To: Honorable Louis J. Perrot Lafayette Parish Clerk of Court
Fax #: 3372916480

Fax sender information

From: Elizabeth A. Roche
Fax #: (504) 881-1765

Sent on: Wed Feb 17 16:12:04 CST 2016

Subject: Salvation Army et al v Union Pacific Railroad Company et al
2016-0548-F 15th JDC

Message:

Attached please find Plaintiffs' Ex Parte Motion to Preserve Evidence
and For Notice

17
February 16
3:10
Shelly Pratt

27

From Elizabeth A. Roche 1.504.881.1765 Wed Feb 17 15:10:37 2016 MST Page 3 of 8



**burns
charest
llp**

Elizabeth Roché
rroche@burnscharest.com

February 17, 2016

Via Facsimile and Federal Express

Lafayette Parish Clerk of Court
Honorable Louis J. Perret
Post Office Box 2009
800 South Buchanan Street
Lafayette, LA 70501

Re: *Salvation Army, et al., v. Union Pacific Railroad Company, et al.*
No. 2016-0548-F, 15th Judicial District Court, Lafayette Parish

Dear Sir or Madam:

Enclosed please find the original copy of *Plaintiffs' Ex Parte Motion to Preserve Evidence and For Notice* and a proposed *Order* to be filed in the above-referenced matter. A duplicate of both the motion and the order is also included. A check for \$80.00 is enclosed to cover the filing costs associated with this motion.

Once Judge Smith has executed the order, please return a conformed copy of the motion and executed order to me in the enclosed self-addressed, stamped envelope for service pursuant to La.Code Civ.P. art. 1313(C).

Should you have any questions, please contact me at (504) 799-2845.

Kind regards,

BURNS CHAREST LLP

Elizabeth A. Roché

EAR/rer
Enclosures

burns charest LLP | 365 canal street | suite 1170 | new orleans, louisiana 70130

From Elizabeth A. Roche 1.504.881.1765 Wed Feb 17 15:10:37 2016 MST Page 4 of 8

Page 2 of 2
February 17, 2016
Lafayette Parish Clerk of Court

cc: Honorable David M. Smith (via facsimile)
Elena Arcos Pecoraro (via facsimile)
Steven J. Levine (via facsimile)
Cliff LaCour (via facsimile)
C T Corporation System, Registered Agent for Union Pacific Railroad Company (via Federal Express)
C T Corporation System, Registered Agent for Southern Pacific Motor Trucking Company (via
Federal Express)
Winslow J. Chadwick, Jr., Registered Agent for Consolidated Companies, Inc. (via Federal Express)

burns charest LLP | 365 canal street | suite 1170 | new orleans, louisiana 70130

From Elizabeth A. Roche 1.504.881.1765 Wed Feb 17 15:10:37 2016 MST Page 5 of 8



15th JUDICIAL DISTRICT COURT
PARISH OF LAFAYETTE
STATE OF LOUISIANA

DOCKET NO. 2016-0548-F

THE SALVATION ARMY, ET AL

VERSUS

UNION PACIFIC RAILROAD COMPANY, ET AL

FILED: _____

DEPUTY: _____

EX PARTE MOTION TO PRESERVE EVIDENCE AND FOR NOTICE

Now into Court, through undersigned counsel, come Plaintiffs, The Salvation Army, Barry J. Sallinger, and Cypress Street Properties, LLC, who move this Court for an order requiring the preservation of evidence and notice related to this matter. In support, Plaintiffs respectfully submit as follows:

1. Plaintiffs filed this lawsuit to address the environmental damage caused by Defendants' operations on the areas of the former Southern Pacific Railroad/Union Pacific Railroad rail yard operations within Lafayette, Louisiana (the "Facility"). These operations have impacted and threaten to impact Lafayette's drinking water supply, the Chicot Aquifer. Plaintiffs own immovable property on or near the former Facility and seek remediation, damages, declaratory judgment, and injunctive relief.
2. The activities complained of in the Petition for Damages began in the early 1900s. Certain documents believed to be in the possession of Defendants contain information regarding the environmental condition of the Facility.
3. These documents are relevant to Defendants' knowledge of those conditions, knowledge of the harmful nature of Defendants' actions and inactions, and knowledge of the actions and inactions that caused the complained of environmental conditions.
4. Document retention policies may be in place that allow for the periodic destruction or "purging" of documents that contain historic information about Defendants' knowledge of the damaging nature of their actions and inactions at and around the Facility.

From Elizabeth A. Roche 1.504.881.1765 Wed Feb 17 15:10:37 2016 MST Page 6 of 8

5. Plaintiffs are also concerned that Defendants may, without prior notice, go to Plaintiffs' property or the Facility and perform work that may alter, disguise, or destroy evidence of the environmental conditions threatening Plaintiffs' property.
6. The above-described evidence is crucial to Plaintiffs' case and must be preserved until Plaintiffs can secure its production and/or have an opportunity to participate in testing at or near the Facility.
7. Plaintiffs are not seeking to stop Defendants from cleaning up their own property. However, given the potential harm to the aquifer and decades of inaction by Defendants, Plaintiffs seek to ensure any cleanup activities protects the aquifer and the public welfare.
8. Unless an order to preserve such evidence is made immediately, evidence may be lost or destroyed prejudicing Plaintiffs.
9. Defendants will not be prejudiced by the immediate issue of an ex parte order preserving evidence.
10. The Plaintiffs have not made any previous ex parte motions to preserve evidence.

Wherefore, Plaintiffs respectfully request that an order preserving evidence and for notice related to this case be issued ex parte and immediately.

Respectfully submitted,



Elizabeth A. Roché (#31304)
Korey A. Nelson (#30002)
Burns Charest LLP
365 Canal Street, Suite 1170
New Orleans, Louisiana 70130
T: 504.799.2845
F: 504.881.1765
E: eroche@burnscharest.com
knelson@burnscharest.com

William W. Goodell, Jr. (#6129)
The Goodell Law Firm
Post Office Box 52663
Lafayette, Louisiana 70505
T: 337.412.2724
E: bill@goodelllaw.com

Gordon Schoeffler (#29412)
Post Office Box 4829
Lafayette, Louisiana 70502

FILED THIS 17
OF Feb 2016
Deputy Clerk of Court

From Elizabeth A. Roche 1.504.881.1765 Wed Feb 17 15:10:37 2016 MST Page 7 of 8

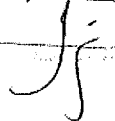
T: 337.232.8123
F: 337.235.5629
E: gschoeffler@josephjoy.com

Joseph R. Joy, III (#7575)
Post Office Box 4929
Lafayette, Louisiana 70502
E: buzzyjoy@josephyjoy.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Ex Parte Motion to Preserve Evidence was served on all known counsel of record, or, if no counsel has appeared, by service on their registered agent or personal service, by electronic mail, facsimile, or by United States mail on this 17th day of February, 2016.


Elizabeth A. Roche

FILED THIS 17
OF Feb 20 16


From Elizabeth A. Roche 1.504.881.1765 Wed Feb 17 15:10:37 2016 MST Page 8 of 8

15th JUDICIAL DISTRICT COURT
PARISH OF LAFAYETTE
STATE OF LOUISIANA

DOCKET NO. 2016-0548-F

THE SALVATION ARMY, ET AL

VERSUS

UNION PACIFIC RAILROAD COMPANY, ET AL

FILED: _____

DEPUTY: _____

ORDER

Considering the foregoing Ex Parte Motion to Preserve Evidence and for Notice,

IT IS HEREBY ORDERED that all documentary, physical, or other evidence related to Plaintiffs' properties or the areas of the former Southern Pacific Railroad/Union Pacific Railroad rail yard operations in Lafayette, Louisiana, and environmental impact therefrom, including any assessment of environmental contamination or the sources of potential contamination, shall be preserved and not destroyed or altered in any way.

IT IS FURTHER ORDERED that Defendants and any of their parents, subsidiaries, and affiliates that have this evidence in their possession shall preserve it until further notice from this court.

IT IS FURTHER ORDERED that no Defendant or its consultants, agents, or representatives shall perform any work, cleanup, or other activity on the Plaintiffs' property or the Facility without ten days' notice to Plaintiffs.

This done and signed this _____ of _____, 2016 in _____, Louisiana.

Honorable David M. Smith
Judge, Division F
15th Judicial District Court

Please return for service
pursuant to La.Code Civ.P. art. 1313(C)



Elizabeth Roché
rroche@burnscharest.com

February 17, 2016

Via Facsimile and Federal Express

Lafayette Parish Clerk of Court
Honorable Louis J. Perret
Post Office Box 2009
800 South Buchanan Street
Lafayette, LA 70501

Re: *Salvation Army, et al., v. Union Pacific Railroad Company, et al.*
No. 2016-0548-F, 15th Judicial District Court, Lafayette Parish

Dear Sir or Madam:

Enclosed please find the original copy of *Plaintiffs' Ex Parte Motion to Preserve Evidence and For Notice* and a proposed *Order* to be filed in the above-referenced matter. A duplicate of both the motion and the order is also included. A check for \$80.00 is enclosed to cover the filing costs associated with this motion.

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Should you have any questions, please contact me at (504) 799-2845.

Kind regards,

BURNS CHAREST LLP

Elizabeth A. Roché

RECEIVED
MAR 03 2016
FROM JUDGE

EAR/rcr
Enclosures

burns charest LLP | 365 canal street | suite 1170 | new orleans, louisiana 70130

Smith
for

Page 2 of 2
February 17, 2016
Lafayette Parish Clerk of Court

cc: Honorable David M. Smith (via facsimile)
Elena Arcos Pecoraro (via facsimile)
Steven J. Levine (via facsimile)
Cliff LaCour (via facsimile)
C T Corporation System, Registered Agent for Union Pacific Railroad Company (via Federal Express)
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Federal Express)
Winslow J. Chadwick, Jr., Registered Agent for Consolidated Companies, Inc. (via Federal Express)

burns charest LLP | 365 canal street | suite 1170 | new orleans, louisiana 70130



15th JUDICIAL DISTRICT COURT
PARISH OF LAFAYETTE
STATE OF LOUISIANA

DOCKET NO. 2016-0548-F

THE SALVATION ARMY, ET AL.

VERSUS

UNION PACIFIC RAILROAD COMPANY, ET AL.

FILED: _____

DEPUTY: _____

EX PARTE MOTION TO PRESERVE EVIDENCE AND FOR NOTICE

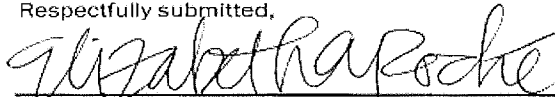
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8. Unless an order to preserve such evidence is made immediately, evidence may be lost or destroyed prejudicing Plaintiffs.
9. Defendants will not be prejudiced by the immediate issue of an ex parte order preserving evidence.
10. The Plaintiffs have not made any previous ex parte motions to preserve evidence.

Wherefore, Plaintiffs respectfully request that an order preserving evidence and for notice related to this case be issued ex parte and immediately.

Respectfully submitted,



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T: 504.799.2845
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Lafayette, Louisiana 70502


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F: 337.235.5629
E: gschoeffler@josephjoy.com

Joseph R. Joy, III (#7575)
Post Office Box 4929
Lafayette, Louisiana 70502
E: buzzyjoy@josephyjoy.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Ex Parte Motion to Preserve Evidence was served on all known counsel of record, or, if no counsel has appeared, by service on their registered agent or personal service, by electronic mail, facsimile, or by United States mail on this 17th day of February, 2016.


Elizabeth A. Roché


MORRIS GIBSON

15th JUDICIAL DISTRICT COURT
PARISH OF LAFAYETTE
STATE OF LOUISIANA

DOCKET NO. 2016-0548-F

THE SALVATION ARMY, ET AL.

VERSUS

UNION PACIFIC RAILROAD COMPANY, ET AL.

FILED: _____

DEPUTY: _____

ORDER


Considering the foregoing Ex Parte Motion to Preserve Evidence and for Notice,

IT IS HEREBY ORDERED that all documentary, physical, or other evidence related to Plaintiffs' properties or the areas of the former Southern Pacific Railroad/Union Pacific Railroad rail yard operations in Lafayette, Louisiana, and environmental impact therefrom, including any assessment of environmental contamination or the sources of potential contamination, shall be preserved and not destroyed or altered in any way.

IT IS FURTHER ORDERED that Defendants and any of their parents, subsidiaries, and affiliates that have this evidence in their possession shall preserve it until further notice from this court.

IT IS FURTHER ORDERED that no Defendant or its consultants, agents, or representatives shall perform any work, cleanup, or other activity on the Plaintiffs' property or the Facility without ten days' notice to Plaintiffs.

This done and signed this 29 of February, 2016 in
Crowley, Louisiana.


Honorable David M. Smith
Judge, Division F
15th Judicial District Court

Please return for service
pursuant to La.Code Civ.P. art. 1313(C)

29
DAY OF Feb., 2016
Noris Gibson
Clerk of Court

Page 1 of 1

over

STATE OF LOUISIANA PARISH OF LAFAYETTE

I hereby certify a certified copy of this
judgment/order has been mailed/served on all

parties this 7 day of March, 2016

Louis Gibson
Deputy Clerk of Court

cc: Elizabeth Roche
Joseph Gay, III
Gordon Dwyer
William Howell
Cliff Lacour


D41421181
cc_telilly

LOUIS J. PERRET
Clerk of Court, Lafayette Parish
P. O. BOX 2009
LAFAYETTE, LA 70502
Telephone: (337) 291-6400

FEBRUARY 18, 2016

FACSIMILE TRANSMISSION RECEIPT

RE: SALVATION ARMY, ET AL
VS
UNION PACIFIC RAILROAD CO, ET AL
DOCKET NUMBER: C-20160548 F

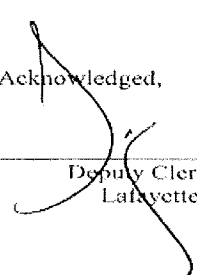
DATE FACSIMILE RECEIVED: 02-17-2016
DESCRIPTION OF PLEADING: M&O TO PRESERVE EVIDENCE AND FOR NOTICE
FILED ON BEHALF OF: THE SALVATION ARMY, ET AL
ATTORNEY: ELIZABETH ROCHE
RECEIPT FAXED TO NUMBER: 504-881-1765

This is to acknowledge that the above described facsimile transmission was received and filed on the date shown above. In accordance with R.S. 13:850(B), the original must be received by our office within seven (7) days (exclusive of legal holidays) from the date the facsimile was received, along with a filing fee of \$112.00 which includes a transmission fee of \$5.00. **Please note that this amount does not reflect any money that you may have on deposit in this matter. It is strictly the amount that is needed to file the above faxed pleading.**

IF YOU HAVE ANY QUESTIONS REGARDING COURT COST IN THIS MATTER, PLEASE CONTACT THE COST DEPARTMENT AT (337) 291-6314.

The Lafayette Parish Clerk of Court's office will not process from a facsimile filing. We will process from original documents only.

Receipt Acknowledged,



Deputy Clerk of Court
Lafayette Parish

* * Transmit Confirmation Report * *

P1

Feb 18 2016 03:10pm

Sender: GUEST
TTL:

TTL Number:

Destination	Type	Mode	Start Time	Time	Page Note	Result	Details
915048811765	FAX	Fine	02/18 03:10pm	00'22"	1	# 0 K	


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cc_telilly

LOUIS J. PERRET
Clerk of Court, Lafayette Parish
P. O. BOX 2009
LAFAYETTE, LA 70502
Telephone: (337) 291-6400

FEBRUARY 18, 2016

FACSIMILE TRANSMISSION RECEIPT

RE: SALVATION ARMY, ET AL
VS
UNION PACIFIC RAILROAD CO, ET AL
DOCKET NUMBER: C-20160548 F

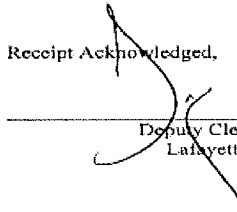
DATE FACSIMILE RECEIVED: 02-17-2016
DESCRIPTION OF PLEADING: M&O TO PRESERVE EVIDENCE AND FOR NOTICE
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RECEIPT FAXED TO NUMBER: 504-881-1765

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The Lafayette Parish Clerk of Court's office will not process from a facsimile filing. We will process from original documents only.

Receipt Acknowledged,



Deputy Clerk of Court
Lafayette Parish

NEUNER PATE
ATTORNEYS AT LAW



February 23, 2016
Via Hand Delivery

P: 337 237 7000
F: 337 233 9450

Lafayette Parish Clerk of Court
800 S. Buchanan St.
Lafayette, LA 70501

RE: The Salvation Army, et al v. Union Pacific
Railroad Company, et al
15th Judicial District Court
Docket No. 2016-0548-F
Our File No.: 19999

CLERK OF COURT
2016 FEB 23 AM 11:06
LAFAYETTE, LA

FRANK X. NEUNER, JR.

JAMES L. PATE

BEN L. MAYEAUX

ROBERT E. TORIAN

JAMES G. HOLLIER

MELISSA L. THERIOT

KEVIN P. MERCHANT

JENNIE P. PELLEGRIN

BRANDON W. LETULIER

JASON T. PREGO

JEREMY N. MORROW

JED M. MESTAYER

PHILIP M. BOUDRFAUX, JR.

CLIFF A. LACOUR

JEFFREY K. COREN

SARA RODRIGUE BUGGS

JACLYN BRIDGES BACON

VICTORIA V. THERIOT

SETH T. MANSFIELD

CAROLYN C. COLE

R. GRAHAM ARNOLD

NICHOLAS G. JONES

DERINCY L. MOUTON

NEW ORLEANS OFFICE

CLERK OF COURT
LAFAYETTE, LA

P: 504 309 6090

Dear Sir or Madam:

Enclosed please find the originals and one copy of each the Request for Notice of Date of Trial, Etc. and the Motion to Enroll as Counsel of Record for Consolidated Companies, Inc. Please file the originals into the record for the above matter and date-stamp the copies and return them to our office courier.

Also enclosed please find my firm's check in the amount of \$50.00 to cover the filing costs associated with same.

Should you have any questions, please contact my office.

Sincerely,

Cliff A. LaCour

CAL/lgd
Enclosures

ALSO ADMITTED IN TEXAS

RECEIVED

FEB 25 2016

FROM JUDGE

STAMPED COPY GIVEN

Via E-mail & U.S. Mail
Mr. William W. Goodell
Ms. Elizabeth A. Roche
Mr. Gordon Schoeffier
Mr. Joseph R. Joy, III

L [Signature]



DOCKET NO. 2016-0548-F

THE SALVATION ARMY, BARRY J.
SALLINGER, and CYPRESS STREET
PROPERTIES, LLC
Plaintiffs

15TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF LAFAYETTE

UNION PACIFIC RAILROAD CO.,
CONSOLIDATED COMPANIES, INC.,
and SOUTHERN PACIFIC MOTOR
TRUCKING COMPANY
Defendants

STATE OF LOUISIANA

REQUEST FOR NOTICE OF DATE OF TRIAL, ETC.

TO THE CLERK OF COURT of the 15th Judicial District Court in and for
the Parish of Lafayette, Louisiana:

Please take notice that NEUNERPATE, attorneys for defendant, Consolidated
Companies, Inc., do hereby request written notice of hearings (whether on merits or
otherwise), orders, judgments and interlocutory decrees, and any and all formal
steps taken by the parties herein, the Judge or any member of Court, as provided in
Louisiana Code of Civil Procedure of 1960, particularly Articles 1572, 1913 and
1914.

Respectfully Submitted:

NEUNERPATE

BY:

Cliff A. LaCour #30581
(CLaCour@NeunerPate.com)
Jeffery K. Coreil #32405
(JCoreil@NeunerPate.com)
1001 West Pinhook Road, Suite 200
Lafayette, LA 70503
Phone: (337) 237-7000
Fax: (337) 233-9450

**ATTORNEYS FOR CONSOLIDATED
COMPANIES, INC.**

FILED THIS

DAY OF

23 February 2016
Janelle NeunerPate
Deputy Clerk of Court

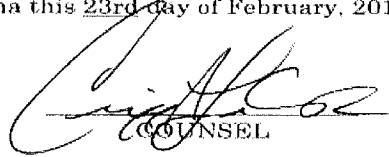
2016 FEB 23 AM 11:06

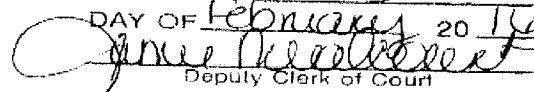


CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading has been served on all counsel of record via email and/or by placing a copy of same in the United States Mail, properly addressed and postage pre-paid.

Lafayette, Louisiana this 23rd day of February, 2016.


COUNSEL

FILED THIS 23
DAY OF February 20 16

Deputy Clerk of Court

Ordered by Atty.: WILLIAM W. GOODELL, JR.



CITATION

SALVATION ARMY, ET AL

FIFTEENTH JUDICIAL DISTRICT COURT

VS

DOCKET NUMBER: C-20160548 F

UNION PACIFIC RAILROAD CO, ET AL

PARISH OF LAFAYETTE, LOUISIANA

STATE OF LOUISIANA

TO: SOUTHERN PACIFIC MOTOR TRUCKING COMPANY
THROUGH ITS REGISTERED AGENT:
C T CORPORATION SYSTEM
3867 PLAZA TOWER DRIVE
BATON ROUGE, LA 70816

RECEIVED
FEB 12 2016
E.B.M. SHERIFF'S OFFICE

of the Parish of E. Baton Rouge

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). You should file an answer or other pleading to said petition in the office of the Clerk of the FIFTEENTH JUDICIAL DISTRICT COURT, in the Lafayette Parish Courthouse, LAFAYETTE, Louisiana, within fifteen (15) days after the service hereof. Alternatively, your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

Witness the Honorable Judges of said Court, this FEBRUARY 2, 2016.

Deputy Clerk of Court
Lafayette Parish

*Attached are the following documents:
PETITION FOR DAMAGES, EXHIBITS A-G

SHERIFF'S RETURN
LAFAYETTE PARISH SHERIFF

DATE SERVED: _____, 20____, TIME: _____
SERVED: _____
PERSONAL () _____
DOMICILIARY () ON _____
UNABLE TO LOCATE _____ MOVED () _____ NO SUCH ADDRESS () _____
OTHER REASON: _____
RECEIVED TOO LATE FOR SERVICE () _____
SERVICE OF WITHIN PAPERS _____
COSTS FEE \$ _____ MILEAGE \$ _____ TOTAL \$ _____
DEPUTY _____

made service on the named party through the
CT Corporation

FEB 13 2016

we are sending a copy of this document to
☐ Benjamin Desouregard ☒ Brenna Desouregard
☐ Anson Reed
E. Cummings
Deputy Sheriff, Parish of East Baton Rouge, Louisiana

Lafayette Parish Clerk of Court
Filed This Day

FEB 14 2016

By: [Signature] Clerk

Ordered by Atty.: WILLIAM W. GOODELL, JR.



cc_jmdaugereau

CITATION

SALVATION ARMY, ET AL

FIFTEENTH JUDICIAL DISTRICT COURT

VS

DOCKET NUMBER: C-20160548 F

UNION PACIFIC RAILROAD CO, ET AL

PARISH OF LAFAYETTE, LOUISIANA

STATE OF LOUISIANA

TO: UNION PACIFIC RAILROAD COMPANY
THROUGH ITS REGISTERED AGENT:
C T CORPORATION SYSTEM
3867 PLAZA TOWER DRIVE
BATON ROUGE, LA 70816

RECEIVED
FEB 17 2016
E.B.R. SHERIFF'S OFFICE

of the Parish of E. Baton Rouge

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). You should file an answer or other pleading to said petition in the office of the Clerk of the FIFTEENTH JUDICIAL DISTRICT COURT, in the Lafayette Parish Courthouse, LAFAYETTE, Louisiana, within fifteen (15) days after the service hereof. Alternatively, your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

Witness the Honorable Judges of said Court, this FEBRUARY 2, 2016.

[Signature]
Deputy Clerk of Court
Lafayette Parish

*Attached are the following documents:

PETITION FOR DAMAGES, EXHIBITS A-G

SHERIFF'S RETURN
LAFAYETTE PARISH SHERIFF

Made service on the named party through the
CT Corporation

DATE SERVED: _____, 20____ TIME: _____
SERVED: _____
PERSONAL () _____
DOMICILIARY () ON _____
UNABLE TO LOCATE _____ MOVED () _____ NO SUCH ADDRESS () _____
OTHER REASON: _____
RECEIVED TOO LATE FOR SERVICE () _____
SERVICE OF WITHIN PAPERS _____
COSTS FEE \$ _____ MILEAGE \$ _____ TOTAL \$ _____
DEPUTY _____

FEB 15 2016
by tendering a copy of this document to
☐ Jeanoline Beauregard ☐ Brenna Beauregard
☐ Alison Reed
E. C. Williams
Deputy Sheriff, Parish of East Baton Rouge, Louisiana

Deputy Parish Clerk of Court
Signed This Day

FEB 24 2016

By Clerk of Court

Ordered by Atty.: WILLIAM W. GOODELL, JR.



cc_jmdaugereau

CITATION

SALVATION ARMY, ET AL

FIFTEENTH JUDICIAL DISTRICT COURT

VS

DOCKET NUMBER: C-20160548 F

UNION PACIFIC RAILROAD CO, ET AL

PARISH OF LAFAYETTE, LOUISIANA

STATE OF LOUISIANA

TO: CONSOLIDATED COMPANIES, INC.
THROUGH ITS REGISTERED AGENT:
WINSLOW J. CHADWICK, JR.
1 GALLERIA BLVD., SUITE 1512
METAIRIE, LA 70001

of the Parish of Jefferson

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). You should file an answer or other pleading to said petition in the office of the Clerk of the FIFTEENTH JUDICIAL DISTRICT COURT, in the Lafayette Parish Courthouse, LAFAYETTE, Louisiana, within fifteen (15) days after the service hercof. Alternatively, your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

Witness the Honorable Judges of said Court, this FEBRUARY 2, 2016.

Deputy Clerk of Court
Lafayette Parish

*Attached are the following documents:

PETITION FOR DAMAGES, EXHIBITS A-G

SHERIFF'S RETURN LAFAYETTE PARISH SHERIFF

DATE SERVED: _____, 20____ TIME: _____
SERVED: _____
PERSONAL () _____
DOMICILIARY () ON _____
UNABLE TO LOCATE _____ MOVED () _____ NO SUCH ADDRESS () _____
OTHER REASON: _____
RECEIVED TOO LATE FOR SERVICE () _____
SERVICE OF WITHIN PAPERS _____
COSTS FEE \$ _____ MILEAGE \$ _____ TOTAL \$ _____
DEPUTY _____

Lafayette Parish Clerk of Court
Shut This Copy

FEB 2 6 2016

By Clerk of Court

DATE RECEIVED 2-11-16 DATE RETD 2-12-16
DATE SERVED 2-12-16
☒ SERVICE AFFECTED OR REASON UNSERVED:
PERSONAL _____ DOMICILIARY THRU _____
THRU / OTHER _____
NOT AT THIS ADDRESS PER _____
UNABLE TO SERVE AFTER MAKING _____ ATTEMPTS
ED KNIGHT # 110577
Deputy Sheriff of Jefferson Parish